



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

May 31, 2023


**BY ECF**

Hon. Lorna G. Schofield  
United States District Judge  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

Application Granted in part. The Government's opposition to Defendant's motion shall be filed by **June 23, 2023**. Defendant's reply shall be filed by **June 30, 2023**. The status conference currently scheduled for June 12, 2023, is adjourned to **July 31, 2023, at 10:45 a.m.** The Clerk of the Court is directed to terminate the letter motion at docket number 55.

Dated: June 1, 2023  
New York, New York

Re: **United States v. Dexter Washington, 23 Cr. 31 (LGS)**

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

The parties jointly write to request an adjournment of the status conference scheduled in this matter for June 12, 2023. As reflected on the docket, on May 25, 2023, Magistrate Judge Gorenstein granted the defendant's motion for bail. (ECF No. 54). The Government understands that the defense is in the process of securing cosigners for the defendant's bond. Because the defendant is likely to be released from the MDC in the near future, and because the June 12 status conference is scheduled to occur before the motions in this case are fully briefed, the parties respectfully request that the status conference be rescheduled to a date after the motions are briefed.

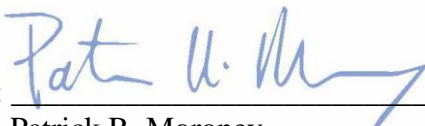
Additionally, because the undersigned is scheduled to begin a RICO murder trial before Judge Caproni on June 12, 2023, the Government respectfully requests that it be permitted to submit its opposition to the defendant's motions by June 23 (from June 16) and that the defense reply be due on June 30 (from June 23). The Government understands that the defense still intends to file motions by this Friday, June 2, but defense counsel graciously consents to this extension.

Finally, in the event that the Court adjourns the June 12 status conference, the Government requests the exclusion of time under the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A), through the date of the rescheduled conference. The exclusion of time will allow the parties to prepare and

brief pretrial motions. Defense counsel has informed the Government that he does not object to the exclusion of Speedy Trial time.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

by:   
Patrick R. Moroney  
Assistant United States Attorney  
(212) 637-2330

cc (by ECF): B. Alan Seidler, Esq.